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UBIQUITI NETWORKS INC. and UBIQUITI  
NETWORKS INTERNATIONAL LIMITED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,  
CHING-HAN TSAI, and DOES 1-20,  
inclusive

Defendants.

UBIQUITI NETWORKS, INC. and UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,

Counterclaimants,

v.

SYNOPSYS, INC.,

Counterdefendant.

Case No. 3:17-cv-00561-WHO

**DECLARATION OF WENDY J.  
RAY IN SUPPORT OF UBIQUITI  
NETWORKS, INC. AND UBIQUITI  
NETWORKS INTERNATIONAL  
LIMITED'S MOTION TO  
EXCLUDE THE EXPERT  
TESTIMONY OF JAMES E.  
MALACKOWSKI AND WILLIAM  
HASLER**

1           1.       I am a partner at the law firm of Morrison & Foerster LLP, attorneys of record in  
2 this action for Defendants Ubiquiti Networks, Inc. and Ubiquiti Networks International Limited  
3 (collectively, “Ubiquiti Defendants”). I submit this declaration in support of the Ubiquiti  
4 Defendants’ Motion to Exclude the Expert Testimony of William Hasler and James E.  
5 Malackowski. I have personal knowledge of the matters set forth below.

6           2.       James E. Malackowski submitted an expert report on August 3, 2018. Attached as  
7 **Exhibit A** to this declaration is a true and correct copy of James E. Malackowski’s expert report.

8           3.       James E. Malackowski sat for a deposition on August 30, 2018, in San Francisco,  
9 California. Attached as **Exhibit B** to this declaration is a true and correct copy of excerpts of the  
10 deposition transcript of James E. Malackowski’s August 30, 2018 deposition.

11          4.       William Hasler submitted an expert report on August 3, 2018. Attached as  
12 **Exhibit C** to this declaration is a true and correct copy of William Hasler’s expert report.

13          5.       William Hasler sat for a deposition on September 6, 2018, in San Francisco,  
14 California. Attached as **Exhibit D** to this declaration is a true and correct copy of excerpts of the  
15 deposition transcript of William Hasler’s September 6, 2018 deposition.

16          6.       Attached as **Exhibit E** to this declaration is a true and correct copy of the errata for  
17 the deposition of William Hasler taken on September 6, 2018. This errata was served by counsel  
18 for Synopsys, Inc. on October 10, 2018.

19          7.       Norm Kelly sat for a deposition on July 24 and July 25, 2018, in San Francisco,  
20 California. Attached as **Exhibit F** to this declaration is a true and correct copy of excerpts of the  
21 transcript of Norm Kelly’s deposition on July 24, 2018.

22          8.       Stephen Edwards sat for a deposition on September 28, 2018, in San Francisco,  
23 California. Attached as **Exhibit G** to this declaration is a true and correct copy of excerpts of the  
24 deposition transcript of Stephen Edwards’ September 28, 2018 deposition.

25          9.       Rajendra Kundapur sat for a deposition on February 2, 2018 in San Francisco,  
26 California and July 18, 2018, in Palo Alto, California. Attached as **Exhibit H** to this declaration  
27 is a true and correct copy of excerpts of the transcript of Rajendra Kundapur’s deposition on  
28 February 2, 2018.

12. Attached as **Exhibit K** is a true and correct copy of Exhibit 351 to Mr. Hasler's deposition, which bears the Bates numbers SNPS0061203 to SNPS0061211 and is entitled *Corporate Governance Best Practices: Strategies for Public, Private, and Not-for-Profit Organizations*, by Frederick D. Lipman and L. Keith Lipman.

Executed on October 11, 2018 at Los Angeles, California.

Wendy J. Ray